

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar Number 14853

STEPHEN R. HANSON II
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Stephen.Hanson@usdoj.gov

Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Ladah Law Firm, PLLC,
Plaintiff,

v.

Case No.

NOTICE OF REMOVAL

ASHLEY RODRIGUEZ-FUENTES;
OSVALDO RODRIGUEZ; OFFICE OF
THE DISTRICT ATTORNEY, CLARK
COUNTY FAMILY SUPPORT DIVISION;
DESERT INSTITUTE OF SPINE CARE,
LLC, a Domestic Limited-Liability
Company; DCP INVESTMENT
HOLDINGS, LLC, a Domestic Limited-
Liability Company dba DCP HOLDINGS,
LLC; SIMONMED IMAGING, INC., a
Foreign Corporation; DANIEL L.
BURKHEAD, M.D., LTD., a Domestic
Professional Corporation, dba
INNOVATIVE PROCEDURAL AND
SURGICAL CENTER; DANIEL L.
BURKHEAD, M.D., LTD., a Domestic
Professional Corporation, dba
INNOVATIVE PAIN CARE CENTER;
CENTENNIAL MEDICAL GROUP, LLP,
a Domestic Limited-Liability Partnership;
MDS MEDICAL DEVICE SPECIALTY
INC., a Domestic Corporation; ENRICO
FAZZINI, D.O., PUEBLO MEDICAL
IMAGING, LLC, a Domestic Limited-
Liability Company; CORE REHAB
COOPERATIVE, LLC, a Domestic Limited-
Liability company; SOUTHERN NEVADA
MEDICAL GROUP LIMITED, a Domestic
Limited-Liability Company; SIERRA MED
SERVICES, a Domestic Company; CENTER

FOR DISEASES AND SURGERY OF THE SPINE; a Domestic Company; VEGAS MEDICAL CENTER PLLC, a General Partnership; NEURORADIUM, LLC, a Domestic Limited-Liability Company; PAYLATER PHARMACY, a Domestic Limited-Liability Company; ANESTHESIA AND INTENSIVE CARE SPECIALISTS, LLP, a Domestic Limited-Liability Partnership; FAMILY DOCTORS RAMANATHAN, PLLC, a Domestic Professional Limited-Liability company dba FAMILY DOCTORS OF GREEN VALLEY; THE LEGAL FUNDING GROUP (NEVADA), a Domestic Limited-Liability company; 5STAR SETTLEMENTS, LLC, a foreign Limited-Liability Company; MONEY FIRST LENDING LLC, a Domestic Limited-Liability Company; PREFERRED CAPITAL FUNDING-NEVADA, LLC, a Domestic Limited-Liability company; CENTERS FOR MEDICARE & MEDICAID SERVICES, DEPARTMENT OF U.S. TREASURY; LOUIS MORTILLARO, PhD., RAXO DRUGS, INC., a Domestic Corporation,

Defendants.

The United States of America hereby removes the above-captioned case to the United States District Court for the District of Nevada. The grounds for removal are as follows:

1. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441(a), 1442(a)(1), 1444 and 1446 for the removal of the case entitled Ladah Law Firm, PLLC, Plaintiff, v. ASHLEY RODRIGUEZ-FUENTES; OSVALDO RODRIGUEZ; OFFICE OF THE DISTRICT ATTORNEY, CLARK COUNTY FAMILY SUPPORT DIVISION; DESERT INSTITUTE OF SPINE CARE, LLC, a Domestic Limited-Liability Company; DCP INVESTMENT HOLDINGS, LLC, a Domestic Limited-Liability Company dba DCP HOLDINGS, LLC; SIMONMED IMAGING, INC., a Foreign Corporation; DANIEL L. BURKHEAD, M.D., LTD., a Domestic Professional Corporation, dba INNOVATIVE PROCEDURAL AND SURGICAL CENTER; DANIEL L. BURKHEAD, M.D., LTD., a Domestic Professional Corporation, dba INNOVATIVE PAIN CARE CENTER; CENTENNIAL MEDICAL GROUP, LLP, a Domestic Limited-Liability Partnership; MDS MEDICAL DEVICE SPECIALTY INC., a Domestic

1 Corporation; ENRICO FAZZINI, D.O., PUEBLO MEDICAL IMAGING, LLC, a Domestic
2 Limited-Liability Company; CORE REHAB COOPERATIVE, LLC, a Domestic Limited-
3 Liability company; SOUTHERN NEVADA MEDICAL GROUP LIMITED, a Domestic
4 Limited-Liability Company; SIERRA MED SERVICES, a Domestic Company; CENTER FOR
5 DISEASES AND SURGERY OF THE SPINE; a Domestic Company; VEGAS MEDICAL
6 CENTER PLLC, a General Partnership; NEURORADIUM, LLC, a Domestic Limited-Liability
7 Company; PAYLATER PHARMACY, a Domestic Limited-Liability Company; ANESTHESIA
8 AND INTENSIVE CARE SPECIALISTS, LLP, a Domestic Limited-Liability Partnership;
9 FAMILY DOCTORS RAMANATHAN, PLLC, a Domestic Professional Limited-Liability
10 company dba FAMILY DOCTORS OF GREEN VALLEY; THE LEGAL FUNDING GROUP
11 (NEVADA), a Domestic Limited-Liability company; 5STAR SETTLEMENTS, LLC, a foreign
12 Limited-Liability Company; MONEY FIRST LENDING LLC, a Domestic Limited-Liability
13 Company; PREFERRED CAPITAL FUNDING-NEVADA, LLC, a Domestic Limited-Liability
14 company; CENTERS FOR MEDICARE & MEDICAID SERVICES, DEPARTMENT OF U.S.
15 TREASURY; LOUIS MORTILLARO, PhD., RAXO DRUGS, INC., a Domestic Corporation
16 Case No. A-21-842555-C, now pending in Eighth Judicial District Court, Clark County, Nevada.

17 2. A copy of the Summons and Complaint are attached hereto as an Exhibit.

18 3. “A civil action ... that is commenced in a State court and that is against or directed
19 to any of the following may be removed by them to the district court of the United States for the
20 district and division embracing the place wherein it is pending: (1) The United States or any agency
21 thereof or any officer (or any person acting under that officer) of the United States or of any agency
22 thereof, in an official or individual capacity, for or relating to any act under color of such office . .
23 . .” 28 U.S.C. § 1442(a)(1).

24 4. The United States Attorney’s Office for the District of Nevada has not been served
25 with the Summons and Complaint by Plaintiff.

26 5. This notice is timely filed in accordance with the provisions of 28 U.S.C. § 1446(b).
27 The United States does not, by filing this notice, waive service of process or any other defenses
28 available under Fed. R. Civ. P. 12(b) or other applicable law.

6. A copy of this notice will be served promptly on Plaintiffs and filed with the Clerk of the District Court, Clark County, Nevada.

WHEREFORE, the United States gives notice that the within action is removed to the United States District Court for the District of Nevada.

Respectfully submitted this 3rd day of January 2022.

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Stephen R. Hanson II
STEPHEN R. HANSON II
Assistant United States Attorney

Certificate of Service

I hereby certify that on January 3, 2022, I electronically filed and served the foregoing Notice of Removal with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system and via US Mail to the address below.

Ramzy P. Ladah Esq.
Ladah Law Firm
517 S. Third Street
Las Vegas, NV 89101
Attorney of Plaintiff

/s/ Stephen R. Hanson II
STEPHEN R. HANSON II
Assistant United States Attorney
United States Attorney's Office